

**PLAINTIFF’S REPLY IN SUPPORT OF MOTION TO PARTIALLY
STRIKE THE TESTIMONY OF DEFENDANT JOEL BABB’S
EXPERT GARY D. HASTON**

EXHIBIT F

Haston Deposition Supplement

Page 1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ALEK SCHOTT,)
Plaintiff,)
v.) Civil Action No.
5:23-cv-00706-OLG-RBF
JOEL BABB, in his individual)
and official capacity;)
MARTIN A. MOLINA III, in his)
individual and official)
capacity; JAVIER SALAZAR,)
in his individual and)
official capacity; and BEXAR)
COUNTY, TEXAS,)
Defendants.)

ORAL DEPOSITION OF

GARY HASTON

JANUARY 10, 2025

ORAL DEPOSITION OF GARY HASTON, produced as a
witness at the instance of the Plaintiff, and duly
sworn, was taken in the above-styled and numbered cause
on January 10, 2025, from 9:07 a.m. to 4:46 p.m.,
before Donna Wright, CSR in and for the State of Texas,
reported by machine shorthand, at the LAW OFFICES OF
WRIGHT & GREENHILL, P.C., 4700 Mueller, Austin, Texas,
pursuant to the Federal Rules of Civil Procedure and
the provisions stated on the record or attached hereto.

A P P E A R A N C E S

FOR THE PLAINTIFF:

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-and-

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FOR THE DEFENDANT JOEL BABB:

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FOR THE DEFENDANTS MARTIN A. MOLINA III
AND BEXAR COUNTY, TEXAS:

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1 information" in your report, you're using that term
2 because you didn't know who the source of the
3 information is. Is that fair?

4 A. That's fair.

5 Q. Okay. Who is Kiki?

6 A. I have no idea.

7 Q. Okay. Do you know what the Laredo Fusion
8 Center is?

9 A. Uh-huh. So not necessarily the Laredo Fusion
10 Center, but what a fusion center is, is where
11 information, intelligence --

12 Q. Sure, sure. And I'm not asking you what a
13 fusion center is more generally, but do you know what
14 the Laredo Fusion Center is specifically?

15 A. Not unless it's one of the fusion centers
16 within the network.

17 Q. Sure. Did you do anything to evaluate whether
18 the Laredo Fusion Center exists?

19 A. I'm certain they have one, but no.

20 Q. Okay. Did you do anything to learn who Kiki
21 was?

22 A. No, ma'am.

23 Q. Okay. As you sit here today, do you know if
24 Kiki was a law enforcement officer?

25 A. I do not.

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REPORTER'S CERTIFICATION OF THE ORAL
DEPOSITION OF GARY HASTON
JANUARY 10, 2025

I, Donna Wright, a Certified Shorthand
Reporter and Notary Public in and for the State of
Texas, hereby certify to the following:

That the witness, GARY HASTON, was duly
sworn by the officer and that the transcript of the
oral deposition is a true record of the testimony given
by the witness;

That the original deposition was delivered to
Ms. Stephen Barron;

That a copy of this certificate was served on
all parties and/or the witness shown herein on

_____;

1 I further certify that pursuant to FRCP Rule
2 30(3) that the signature of the deponent:

3 ___X___ was requested by the deponent or a party
4 before the completion of the deposition and that the
5 signature is to be before any notary public and
6 returned within 30 days from date of receipt of the
7 transcript. If returned, the attached Changes and
8 Signature page contains any changes and the reasons
9 therefore:

10 _____ was not requested by the deponent or a
11 party before the completion of the deposition.

12 I further certify that I am neither counsel
13 for, related to, nor employed by any of the parties or
14 attorneys in the action in which this proceeding was
15 taken, and further that I am not financially or
16 otherwise interested in the outcome of the action.

17 Certified to by me on this, the 14th day of
18 January, 2025.

19
20
21 

22 DONNA WRIGHT, Texas CSR 1971

Expiration Date: 11/30/26

23 VERITEXT LEGAL SOLUTIONS

300 Throckmorton Street

24 Ft. Worth, Texas 76102

Firm Registration No. 571
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